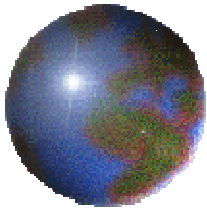
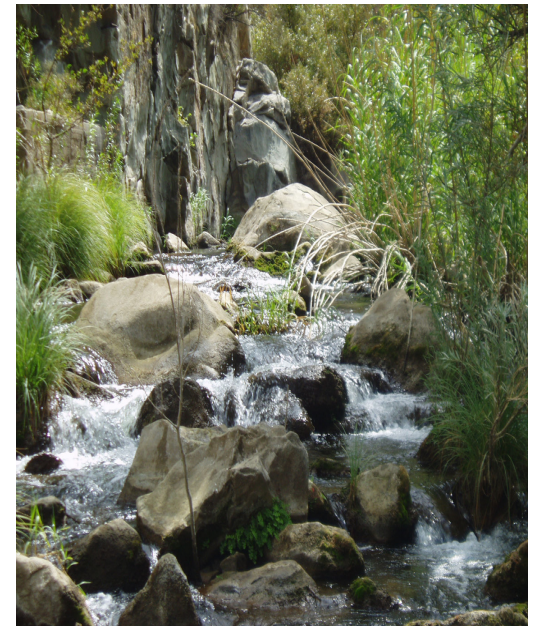


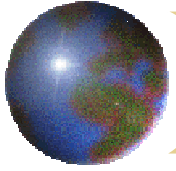


*Ventura Countywide
Stormwater Quality
Management Program*



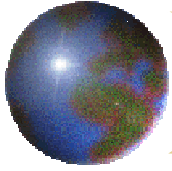
**Ventura Countywide
Municipal Stormwater
Program and Draft
RWQCB Permit**





Presentation Overview

- ✚ Ventura County Overview
- ✚ Countywide NPDES Program
- ✚ Draft Permit Highlights
- ✚ Issues
- ✚ Estimated Costs
- ✚ Summary

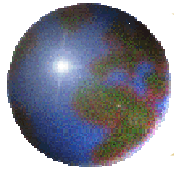


Ventura County Overview

- 4 Major watersheds
 - Distinct dominant land-use and H&H patterns
 - Watershed councils/management plans
 - Advanced process modeling

- Land Coverage
 - 12% Urban Area
 - 8% Agriculture
 - 80% Open Space

- Population ~835,000
 - 10 cities
 - 4 cities >100,000 (Phase 1)
 - 6 Cities (Phase 2)



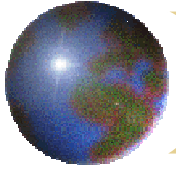
Stormwater Permit Co-Permittees

1992 - Implementation Agreement Signed Between:

- ❖ **Watershed Protection District**
- ❖ **County of Ventura**
- ❖ **10 Cities in the County of Ventura**

Camarillo	Fillmore
Port Hueneme	Moorpark
Ojai	Oxnard
San Buenaventura	Santa Paula
Simi Valley	Thousand Oaks

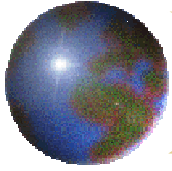
Principal Co-Permittee: Ventura County Watershed Protection District



Ventura Countywide Program History

The 1994 permit defined the basic program elements including:

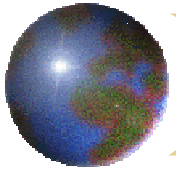
- Public outreach
- Business inspection
- Construction, land development, public infrastructure, & illicit discharge inspections
- Monitoring of dry and wet weather runoff.



Ventura Countywide Program History

The 2000 Permit, currently on administrative extension, required the Co-permittees to:

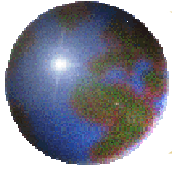
- Enhance existing program elements
- Develop new fiscal analysis requirements
- Conduct educational site visits
- Technical Guidance Manual for all new development and redevelopment projects



Exemplary Program

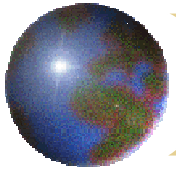
- Best Municipal Program in Nation
- Cooperative approach
- WQ priority and vision





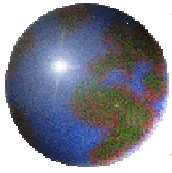
2006 3rd Term Permit Draft

- ✚ On December 27, 2006, RWQCB comprehensive and prescriptive Draft Permit
- ✚ Permit significantly increases each Permittee's responsibilities and activities
- ✚ Significant cost implications



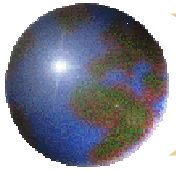
TOP 5 Permit Issues:

- ❖ Municipal Action Limits (MAL's)
- ❖ Total Maximum Daily Loads (TMDL's)
- ❖ Increased Monitoring
- ❖ Public Agency/Land-use Requirements
- ❖ Hydromodification



MAL's:

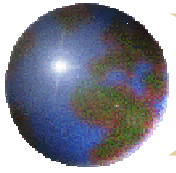
- Attempt at “quantifiable” performance measures
- Measured at end of pipe
- Subject to fines
- Counter to Federal and State Maximum Extent Practical
- Numeric limit in disguise



Numeric Limits - Legal

Numeric Limits Contrary to EPA Policy:

"In regulating stormwater permits the EPA has repeatedly expressed a preference for doing so by way of BMPs, rather than by way of imposing technology based or water quality based numerical limitations." (Divers' v. SWRCB (2006) 145 Cal.App.4th 246, 256.)

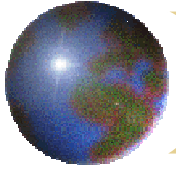


Numeric Limits - Legal

Contrary to SWRCB's Blue Ribbon Panel Report:

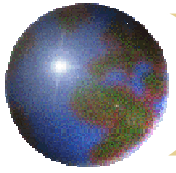
"It is not feasible at this time to set enforceable numeric effluent criteria for municipal BMPs and in particular urban discharges....."

For catchments not treated by a structural or treatment BMP, setting a numeric effluent limit is basically not possible."



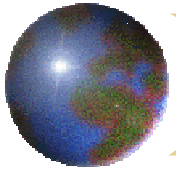
TMDL's

- ✚ TMDL's = safety net for NPDES programs
- ✚ Separate sections of CWA
- ✚ Monitoring and Compliance with TMDLs included
- ✚ Problem - separation of mixed waters



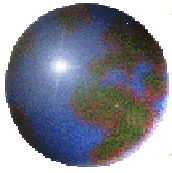
MONITORING:

- ✚ Expensive
- ✚ Reasoned approach (vision)
- ✚ Leverage all monitoring efforts
- ✚ Proceed stepwise up the watershed



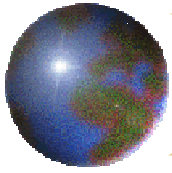
Public Agency Requirements:

- ✚ Obtain General SW Construction Permit coverage for Capital Improvement Projects 1 acre or more in size, including street repaving, new streets, channel clearing
- ✚ Trash Excluders for all areas zoned Commercial, Industrial or near schools



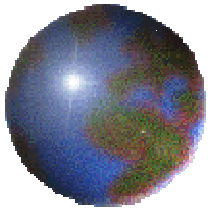
Land-use Requirements:

- Reduce Effective Impervious Area to less than 5% of total project area;
- Low Impact Development principles for all new and redevelopment projects that add or replace 5,000 square feet or more of impervious area;
- Moratorium on Hillside construction from October 1st to April 15th with slope greater than 20% slope, or 303(d) listed waterbodies for sediment, or areas mapped for ESA.

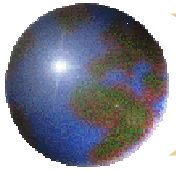


Hydromodification:

- Objective is to maintain the Project's pre-development storm water runoff flow rates and durations
- Hydrologic control in natural drainage systems shall be achieved by maintaining the Erosion Potential (E_p) in streams at a value of 1

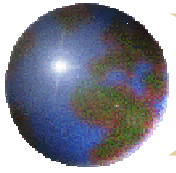


OTHER ISSUES OF IMPORT



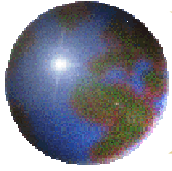
Special Studies

- Trash and Debris Study – Quantify trash and debris, and type from coastal areas and beaches within County of Ventura
- Pyrethroid Insecticides Study
- SCCWRP's Hydromodification Control Study
- Low Impact Development Guidance Manual
- Southern California Bight Project - Participate



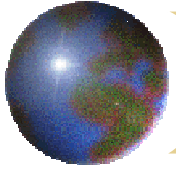
Legal – Authority, Mandate, Coverage

- ✚ CWA vs. Porter/Cologne
(unfunded mandates)
- ✚ MALs used to determine Compliance with
Federal Clean Water Act's MEP
- ✚ Coverage - “areas undergoing urbanization”
vs. “urban areas”



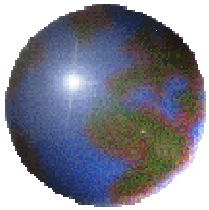
RWQCB Process Issues:

- ✚ TRUST – same team/same goals
- ✚ Recognition of local commitment and expertise
- ✚ Limited interaction with staff and stakeholders
- ✚ Responsibility for issues outside of control

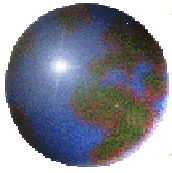


RWQCB Perception Issues:

- ✚ 15 years of “little” or “no” progress
- ✚ “Permittees rudderless without permit guidance”
- ✚ “Permittees only act as a consequence of permit requirements”



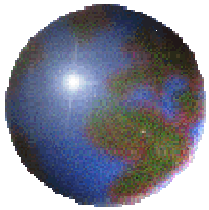
REVENUES AND EXPENSES



Current Program Revenues

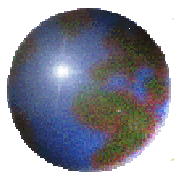
WPD WQ Benefit Assessment

Principal Permittee Program:	\$1.4 million
Co-Permittee's Program:	\$1.6 million
Total Revenue:	\$3 million



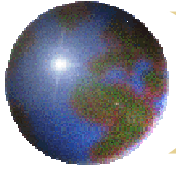
***Currently permittees' expenditures
exceed \$15M/year***

***Community polling shows support
for PRF total of \$7M/year***



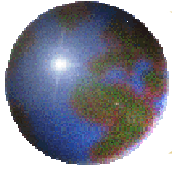
Estimated 3rd Term Permit Costs: (with TMDLs)

Program	Annual Cost \$/Household			
	Current Effort	Draft Order Baseline	Baseline + Trash Excluders	Baseline + Excluders + MAL Compliance+TMDLs
Statewide Study				
Range				
Mean	\$18-46	--	--	--
	\$29	--	--	--
Ventura County				
Range				
Mean	\$18-44	--	--	--
	\$35	\$60	\$87	\$400



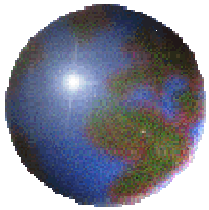
Permit Adoption Process

- December 2006 – 1st Draft Permit
- April 2007 – 1st RWQCB Permit Workshop (Burbank)
- Summer 2007 RWQCB and Countywide Permittee Staff Meetings – Issue Committees
- August 2007 – 2nd Draft Permit
- September 2007 – 2nd RWQCB Permit Workshop (Ventura)
- Winter 2008 – Tentative Order
- June 2008 RWQCB Hearing - Tentative Order adoption

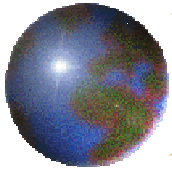


CONCLUSION

- ✚ Goal – Improvement and Protection of Water Quality
- ✚ Increasing Effort = Increasing Cost
Desire Increased Cost = Improved WQ



Questions/Comments



Current Permit Costs

Fiscal Year 2005-2006:

Camarillo	16%
County of Ventura	8%
Fillmore	5%
Moorpark	20%
Ojai	20%
Oxnard	25%
Port Hueneme	6%
San Buenaventura	22%
Santa Paula	0%
Simi Valley	3%
Thousand Oaks	35%
VCWPD	0%